

ANDERSON KILL P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020
TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733
www.andersonkill.com

Jerry S. Goldman, Esq.
Jgoldman@andersonkill.com
212-278-1569

Via ECF

July 18, 2022

The Honorable George B. Daniels
U.S. District Judge
United States District Court
Southern District of New York
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, No. 03-MDL-1570
(GBD) (SN) – Response to Letters from John F. Schutty

Dear Judge Daniels and Magistrate Judge Netburn:

Undersigned counsel writes today on behalf of thousands of plaintiffs in the above-referenced multi-district litigation (“MDL”) in response to the letters filed by Mr. John F. Schutty, dated July 8, 2022 and July 14, 2022 (collectively, “Letters”), suggesting revised protocols for entering default judgments against the Taliban. ECF Nos. 8187, 8205. Given the Court’s recent admonition that “no further papers are to be filed” regarding proposals for “the management of pending default judgments against the Taliban,” ECF No. 7818, we simply note that the Letters raise issues previously briefed by undersigned counsel and addressed by the Court, most recently on July 11, 2022 in comprehensive fashion. *See, e.g.*, Order, ECF No. 8198. The Court’s existing procedures for entering default judgments have ample support in the case law and in this Court’s own jurisprudence for the past twenty (20) years. Mr. Schutty’s suggestion to fundamentally alter this Court’s well-reasoned approach to managing this complex case is wrong and must be rejected.

We thank the Court for its attention to this matter.

ANDERSON KILL P.C.

MOTLEY RICE

/s/ Jerry S. Goldman, Esquire
Jerry S. Goldman, Esquire
1251 Avenue of the Americas, 42nd Floor
New York, NY 10020

/s/ Robert T. Haefele, Esquire
Robert T. Haefele, Esquire
28 Bridgeside Boulevard
Mt. Pleasant, SC 29464

cc: All MDL Counsel of Record (via ECF)

New York, NY ■ Los Angeles, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA